

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CHRISTA B. FISCHER,  
Individually and On Behalf of Other  
Similarly Situated Employees

Civil No. 5:19-cv-04924-JMG

Plaintiff,

v.

FEDERAL EXPRESS CORP.,

Defendant.

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**JOINT PROPOSED NOTICE AND NOTICE PLAN**

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Pursuant to the Court's Order at ECF No. 52, Plaintiff Christa Fischer, on behalf of herself and all others similarly situated, and Defendant Federal Express Corporation (collectively, the "Parties"), hereby submit the following joint proposed notice plan:

1. The Parties request that the Court authorize and approve the Notice and Opt-in Consent Form attached at Exhibit A and the Reminder Notice at Exhibit B.

2. The Parties have also stipulated to the following notice process and schedule:

- a. Plaintiff's Counsel shall send the Notice and Opt-in Consent Form via U.S. Mail and email (if available).
- b. Eligible individuals shall have forty-five (45) days from the date that Notice is distributed to submit their Opt-in Consent Form to Plaintiff's Counsel and to opt-in to this action ("Notice Period"). Opt-in Consent Forms that are post-marked during the Notice Period will be considered timely for purposes of being returned during the Notice Period.
- c. Plaintiff's Counsel shall distribute the Reminder Notice via U.S. Mail and email twenty-one (21) days before the close of the notice period.

- d. Plaintiff's Counsel shall file with the Court any returned Opt-in Consent Forms as they are received.
- e. For any mailed Notice returned as undeliverable with a forwarding address, Plaintiff's Counsel shall mail the court-approved Notice and Opt-in Consent Form to the forwarding address provided. For any mailed Notice returned as undeliverable without a forwarding address, Plaintiff's Counsel may conduct a reasonable search for the eligible individual's most recent mailing address, and, if found during the Notice Period, will mail the Notice and Opt-in Consent Form to the updated address.

Date: June 9, 2023

Respectfully submitted,

**NICHOLS KASTER, PLLP**

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